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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 Alexandria Division

4 ----- x
5 TIARRA FAIN, :
6 Plaintiff, :
7 vs. : CASE NO. 3:12-CV-293
8 RAPPAHANNOCK REGIONAL JAIL, :
9 et al., :
10 Defendants. :

11 ----- x
12 Deposition of OFFICER TINA SCHOOLFIELD

13 Stafford, Virginia

14 Tuesday, February 12, 2013

15 1:57 p.m.

16 Job No.: 32439

17 Pages: 1 - 32

18 Reported by: Sarah M. Bickel, RPR

PLAINTIFF'S
EXHIBIT

tabbed

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CONDUCTED ON TUESDAY, FEBRUARY 12, 2013

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1 responsibility?

2 A Well, I did work medical at times, but I
3 just worked anywhere in the facility.

4 Q Now, do you recall the case of Tiarra
5 Fain?

6 A Very little.

7 Q Did you have occasion to treat her
8 medically at any time or look at her as a medical
9 case at any time?

10 A No, sir.

11 Q Did you have ever an occasion to do
12 anything with her transportation?

13 A No, sir.

14 Q Did you ever have anything to do with her
15 while she was at the hospital?

16 A I did, but I don't remember a lot about
17 it.

18 Q Do you -- in your duties as a medical
19 officer, what do you do? Can you describe those
20 functions for me?

21 A Yes, sir. I'm the only officer down in
22 medical, and I'm there as the inmates come in and

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1 labeled RRJ 301 and RRJ 302 that have previously been
2 labeled Exhibit 1 in a different deposition, Giuffra,
3 and your name appears on the second sheet.

4 I ask if you can tell me what that entry
5 means. It's sort of towards the top there.

6 A Let me get my glasses on here. That would
7 mean that I worked that -- I don't know whether it
8 was -- I guess it looks like it would have been
9 morning on -- until 19:00 on 4/19. Relieving McRay
10 is what it says on here.

11 Q Relieving what?

12 A It looks like -- I'm not sure what that
13 says. No, he was somewhere else. I apologize.
14 Stone. Stone.

15 Q So you relieved Stone?

16 A That's what it looks like, yes, sir.

17 Q Do you know what time he came on?

18 A Well, normal shift would have been in the
19 morning.

20 Q Does it say what time?

21 A This says 05:45, but that would not have
22 been the time I would have gone. I was at the

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1 to drive over there. It takes a lot longer than that
2 to get there. I don't know for sure. It could be,
3 though.

4 Q Do you have any recollection of what her
5 condition was like during that time?

6 A No, sir.

7 Q Do you know whether or not she was
8 restrained during that period of time?

9 A I have -- I don't have any recollection of
10 much of any of it, sir.

11 Q According to your procedure, if she had
12 already delivered the baby, would she have been
13 restrained during --

14 A If she had already delivered the baby, me
15 personally, I would have had one restraint on her
16 ankle.

17 Q Would you have had any other restraints on
18 her?

19 A No, sir.

20 Q Is that up to the officer's choice, or is
21 that a policy?

22 A Well, for policy, it's actually supposed

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1 to be two when they're -- anybody who's at the
2 hospital, from what I understand, but I -- because of
3 her having a baby, I'm a mother myself and I -- you
4 know, with the restraints, I don't put them on the
5 arms, I just put one on the leg. She's not going to
6 go anywhere like that.

7 Q Did you have occasion to discuss this case
8 with anybody other than your attorney?

9 A No, sir.

10 Q Do you have any knowledge of whether or
11 not she was restrained during the time she delivered
12 the baby?

13 A No, sir.

14 Q Do you know whether or not she had had a
15 high-risk pregnancy?

16 A No, sir.

17 Q Do you know whether or not she had a
18 history of macrosomia?

19 A No, sir.

20 Q Do you know if any time the fetal blood
21 monitor indicated that the baby was in trouble?

22 A No, sir.

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1 A Absolutely not.

2 Q -- or anything like that?

3 A Absolutely not, no, sir.

4 Q So you remove it completely?

5 A Completely, yes, sir.

6 Q Do you know whether or not keeping those
7 restraints on after delivery is against hospital
8 policy?

9 A Is against -- I don't -- is against
10 hospital policy?

11 Q Yes. Do you know?

12 A No, sir.

13 Q Have you ever had occasion to refuse a
14 direction from a medical personnel there to remove
15 restraints?

16 A No, sir.

17 Q Was there ever occasion --

18 A I was actually never given -- can I -- I
19 was never actually given a directive from anybody to
20 ever remove anything from anyone, so, you know --

21 Q So it never came up, one way or the other?

22 A Never, ever. No, sir, never had an issue.

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1 Q You never had a nurse say, Take them
2 off --

3 A Absolutely not.

4 Q -- and you took them off or didn't take
5 them off?

6 A There's never an issue. No one's ever
7 asked me anything like that.

8 Q Am I correct that no nurse or doctor over
9 there, or anybody else at the hospital, for that
10 matter, has ever asked you to remove any restraints?

11 A No, sir, they've never.

12 Q So they've left it entirely up to you?

13 A Nobody's ever asked me to remove anything.

14 Q And if my client were to say that the
15 nurse insisted and Defendant Schoolfield removed the
16 handcuffs; once the nurse left, she recuffed the
17 plaintiff and hid the restraints under a blanket,
18 that would be untrue; is that correct?

19 A That is very untrue, sir.

20 Q While you were there, at any time did the
21 issue of breastfeeding come up?

22 A No, sir.

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1 Q Did you observe whether or not Ms. Fain
2 was breastfeeding her baby?

3 A I don't remember.

4 Q According to policy, during the
5 post-delivery period if there's breastfeeding going
6 on, are the restraints removed for that?

7 A I don't put restraints on because of the
8 baby -- you know, I don't know what their policy is.
9 It's like a two-point restraint. I believe since
10 that's changed, but it's always been a two-point
11 restraint. I just put it on the ankle. I don't
12 know.

13 Q Do you recall if, after you left, a male
14 guard replaced you, by any chance?

15 A I don't remember that, sir.

16 Q Do you know anything about a breast
17 pump --

18 A No, sir.

19 Q -- being ordered for Ms. Fain?

20 A No, sir.

21 Q Do you know whether or not Ms. Fain
22 received her pain medications after she returned